## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:		Chapter 9
City of Detroit, Michigan,		Case No. 13-53846
Debtor.		Hon. Steven W. Rhodes
	/	

## PETITIONERS' RESPONSE TO RESPONDENTS SNYDER AND DILLON'S MOTION FOR RECONSIDERATION (DKT. #1745) OF OPINION AND ORDER (DKT. #1536-1) DENYING NAACP'S MOTION FOR RELIEF FROM STAY AND GRANTING PHILLIPS MOTION FOR RELIEF FROM STAY

NOW COME Petitioners, as Plaintiffs in the United States District Court Eastern District of Michigan Case No. 13-CV-11370, by and through their attorneys, and in response to Respondents Snyder and Dillon's Motion for Reconsideration, respectfully pray that this Honorable Court DENY Respondents' motion for the reasons set forth in the brief attached hereto as Exh. 3.

Dated: December 2, 2013 Respectfully submitted,

\_\_\_\_/s/Hugh M. Davis\_\_\_ Hugh M. Davis (P12555) Cynthia Heenan (P53664) Constitutional Litigation Associates, PC 450 W. Fort St., Ste. 200 Detroit, MI 48226 (313) 961-2255/Fax: (313) 961-5999 Davis@ConLitPC.com and Heenan@ConLitPC.com Attorneys for Petitioners

Julie H. Hurwitz (P34720) William H. Goodman (P14173) Attorneys for Petitioners Goodman & Hurwitz PC on behalf of Detroit & Michigan National Lawyers Guild 1394 E. Jefferson Ave.
Detroit, MI 48207
(313) 567-6170/Fax: (313) 567-4827
jhurwitz@goodmanhurwitz.com
bgoodman@goodmanhurwitz.com
Attorneys for Petitioners

John C. Philo (P52721)
Anthony D. Paris (P71525)
SUGAR LAW CENTER
FOR ECONOMIC & SOCIAL JUSTICE
4605 Cass Ave., 2nd Floor
Detroit, Michigan 48201
(313) 993-4505/Fax: (313) 887-8470
jphilo@sugarlaw.org
tparis@sugarlaw.org
Attorneys for Petitioners

Herbert A. Sanders (P43031)
THE SANDERS LAW FIRM PC
615 Griswold St. Ste. 913
Detroit, Michigan 48226
(313) 962-0099/Fax: (313) 962-0044
haslawpc@gmail.com
Attorneys for Petitioners

Richard G. Mack, Jr. (P58657) Keith D. Flynn (P74192) MILLER COHEN, P.L.C. 600 W. Lafayette Blvd., 4th Floor Detroit, Michigan 48226 (313) 964-4454/Fax: (313) 964-4490 richardmack@millercohen.com Attorneys for Petitioners

Darius Charney
Ghita Schwarz
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th floor
New York, New York 10012
(212) 614-6464/Fax: (212) 614-6499
dcharney@ccrjustice.org
Attorneys for Petitioners